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Attorneys for Plaintiff, Travelodge Hotels, Inc.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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TRAVELODGE HOTELS, INC., a  
Delaware Corporation,

Plaintiff,

v.

JIAAN HOSPITALITY, INC., an Indiana  
Corporation; VIPUL PATEL, an individual;  
PRAKASH PATEL, an individual; and  
PRATYUSH PATEL, an individual,

Defendants.

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Civil Action No. 2:23-cv-00749-CCC-JRA

**FINAL JUDGMENT BY DEFAULT  
AGAINST DEFENDANTS**

This matter having been opened to the Court by plaintiff, Travelodge Hotels, Inc. (“THI”), by its attorneys, Connell Foley LLP, seeking the entry of Final Judgment by Default against defendants, Jiaan Hospitality, Inc., Vipul Patel, Prakash Patel, and Pratyush Patel (collectively, the “Defendants”), pursuant to Fed. R. Civ. P. 55(b)(2); and it appearing that the Complaint in this matter was filed on February 8, 2023, seeking damages as a result of the breach of a franchise agreement between THI and Defendants; and service of the Summons and Complaint having been effectuated with respect to Jiaan Hospitality, Inc., by personal service of its registered agent in Orland Park, Illinois on February 24, 2023, Vipul Patel, by personal service in Orland Park, Illinois on February 24, 2023, Prakash Patel, by personal service in Battle Creek, Michigan on February 24, 2023, and Pratyush Patel, by personal service in Channahon, Illinois on February 23, 2023; and it appearing that default was duly

noted by the Clerk of the Court against Defendants on June 6, 2023 for their failure to plead or otherwise defend in this action; and the Court having reviewed the papers; and good cause having been shown:

**IT IS** on this 5th day of September, 2024,

**ORDERED, ADJUDGED, AND DECREED** that THI have judgment against Defendants, jointly and severally, in the total amount of \$330,419.45, comprised of the following:

- a) \$113,719.33 for outstanding Recurring Fees (principal plus prejudgment interest).
- b) \$216,700.12 for Liquidated Damages (principal plus prejudgment interest).

*/s/ Claire C. Cecchi*

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**HONORABLE CLAIRE C. CECCHI, U.S.D.J.**